

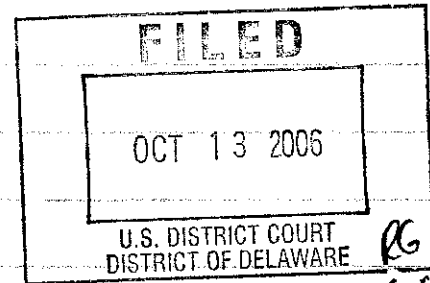
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

-VS-

CA NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL.



PLAINTIFF'S MOTION FOR DISCOVERY # III

COMES NOW, THE PLAINTIFF JIMMIE LEWIS, PRO-SE
AND SUBMITS THIS MOTION TO THIS HONORABLE COURT
IN ACCORDANCE TO THIS COURT GRANTING A ORDER
FOR DISCOVERY, IN ORDER TO BRING FORTH THE TRUTH,
THE WHOLE TRUTH AND NOTHING BUT THE TRUTH,
AND ASSERTS THE FOLLOWING :

DATE: 10/10/06

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

- 1.) WHEN THE PLAINTIFF WAS (4) POINT RESTRAINED COULD HE BE A DANGER TO HIMSELF, IF YES, STATE HOW.
- 2.) WHEN THE PLAINTIFF WAS (4) POINT RESTRAINED COULD HE BE A DANGER TO ANY ONE ELSE, IF YES, STATE HOW.
- 3.) A TOTAL OF HOW MANY TIMES WAS THE PLAINTIFF PLACED IN THE SECLUSION ROOM
- 4.) DESCRIBE THE DESIGN OF THE SECLUSION ROOM
- 5.) WHY WAS THE CHEF SALAD ORDERED FOR THE PLAINTIFF.
- 6.) WHY WAS THE PLAINTIFF'S CHEF SALAD DISCONTINUED.
- 7.) WAS JAMES FLOYDD ORDERED A CHEF SALAD, IF YES, ON WHAT DATE.
- 8.) WAS JAMES FLOYDD ORDERED A TOSS SALAD, IF YES, ON WHAT DATE.
- 9.) WHEN WAS THE PLAINTIFF'S ~~CHIEF~~ CHEF SALAD ORDERED.
- 10.) WAS JAMES FLOYDD'S TOSS SALAD DISCONTINUED, IF YES, ON WHAT DATE.
~~WHEN~~

- 11.) CAN A PERSON'S DIET BE LINKED TO RELIGIOUS OBLIGATIONS.
- 12.) WHY DID THE PLAINTIFF WEAR PAPER HORNS ON HIS HEAD.
- 13.) HOW LONG HAS THE NO SHAVING HEAD WITH RAZORS BEEN IN EFFECT, PRODUCE THE RULE STATING THIS.
- 14.) DO THE DEFENDANTS WANT TRIAL BY JUDGE OR TRIAL BY JURY.
- 15.) WHY DID IT TAKE 6 1/2 MONTHS TO TRANSFER LEWIS TO THE D.P.C
- 16.) WHO IS RESPONSIBLE FOR THE PLAINTIFF NOT RECEIVING A COMPETENCY HEARING BEFORE BEING TRANSFERRED BACK TO THE D.O.C
- 17.) WHY DID DR. FOSTER CHOOSE TO CLAIM THAT, THE PLAINTIFFS CLAIMS IN FULL OR IN PART ARE BARRIED BY THE DOCTRINE OF COMPARATIVE NEGLIGENCE AND OR ASSUMPTION OF RISK, AS IF TO SAY THE PLAINTIFF SHOULD HAVE BEEN EXPECTING ~~THE~~ TO BE TREATED IN THE MANNER DESCRIBED IN HIS COMPLAINT.
- 18.) WHY WASN'T THE PLAINTIFF'S EMERGENCY CONTACT NOT NOTIFIED BEFORE HE WAS (4) POINT RESTRAINED AND OR BEFORE HE WAS INJECTED WITH PSYCHOTROPIC ~~DRUGS~~ DRUGS.

19.) WHY DID DR. FOSTER CLAIM THAT THE PLAINTIFFS' CLAIMS ARE BARRED BY DOCTRINES OF LACHES.

20.) WHY DID DR. FOSTER CLAIM THAT THE PLAINTIFFS' CLAIMS ARE BARRED BY DOCTRINES OF ESTOPPEL.

21.) WHY DID DR. FOSTER CLAIM THAT THE PLAINTIFFS' CLAIMS ARE BARRED BY DOCTRINES OF ACQUIESCENCE.

22.) WHY DID DR. FOSTER CLAIM THAT THE PLAINTIFFS' CLAIMS ARE BARRED BY DOCTRINES OF RATIFICATION.

23.) WHY DID DR. FOSTER CLAIM THAT THE PLAINTIFFS' CLAIMS ARE BARRED BY DOCTRINES OF UNCLEAN HANDS AND WAIVER.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS PRO-SE
DUE HEREBY CERTIFY ON THIS 10TH, DAY OF
SEPT, 2006, THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE PLAINTIFF'S MOTION FOR
DISCOVERY TO THE FOLLOWING :

CLERK OF THE COURT (GMS)	CYNTHIA BEAM ESQ
J. CALEB BOGGS FEDERAL BUILDING	1001 JEFFERSON PLAZA, SUITE 202
844 N. KING ST, LOCKBOX 18	WILMINGTON, DE 19801
WILMINGTON, DE 19801	

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
CARVEL STATE BUILDING
WILMINGTON, DE 19801

DATE: 10/10/06

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K-FRA
J.M.



Clerk of the Court (GMS)
U.S. DISTRICT COURT
844. N KING ST, LOCKBOX 18
WILMINGTON, DELAWARE
19801

